

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Case No. 03-30275 MAP

DIRECTV, Inc.

V.

MANUEL GONCALVES

)
)
)
)
)

ANSWER OF DEFENDANT

1. The Defendant neither admits nor denies the allegations of Paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16 and 17 of the Complaint and requests that the Plaintiff prove said allegations.
2. The Defendant denies the allegations of Paragraphs 18, 19, 19b, 19c, 20, 21, and 22 of the Complaint.
3. The Defendant neither admits nor denies the allegations of Paragraphs 23, 24 and 25 of the Complaint.

COUNT I

4. The Defendant repeats and realleges his answers to Paragraphs 1 through 25 of the Complaint.
5. The Defendant denies the allegations of Paragraphs 27, 28, and 29 of the Complaint.

COUNT II

6. The Defendant repeats and realleges his answers to Paragraphs 1 through 29 of the Complaint.
7. The Defendant admits the allegations of Paragraph 31 of the Complaint.
8. The Defendant denies the allegations of Paragraphs 32, 33, and 34 of the Complaint.

COUNT III

9. The Defendant repeats and realleges his answers to Paragraphs 1 through 34 of the Complaint.
10. The Defendant denies the allegations of Paragraphs 36, 37, 38, 39 40 and 41 of the Complaint.

COUNT IV

11. The Defendant repeats and realleges his answers to Paragraphs 1 through 41 of the Complaint.
12. The Defendant denies the allegations of Paragraphs 43, 44, 45 and 46 of the Complaint.

DEFENSES

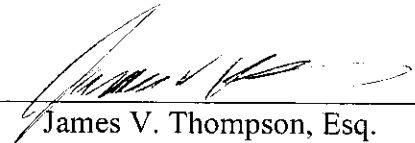
1. The Plaintiff fails to state a claim for which relief may be granted.
2. The Plaintiff fails to bring this action in the time allowed by law.
3. The Defendant states that service of process was insufficient.
4. The Defendant states that the venue herein is improper.

WHEREFORE, the Defendant asks that all Counts of this Complaint be dismissed.

THE DEFENDANT
MANUEL GONCALVES

Dated: 3/17/04

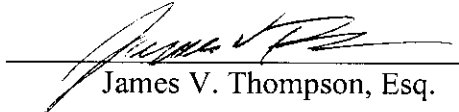
by



James V. Thompson, Esq.
358 Sewall Street
Ludlow, MA 01056
(413) 583-5196
BBO# 496 720

Certificate of Service

I, James V. Thompson, Esq., certify that I mailed a copy of foregoing Answer of Defendant, Michael Goncalves, and notice of my Appearance to the attorney for the Plaintiff, John M. McLaughlin, Esq., McLaughlin Sacks, LLC, 31 Trumbull Road, Northampton, MA 01060 by regular mail, postage prepaid, on March 17, 2004.


James V. Thompson, Esq.